

Trey A. Monsour
State Bar No. 14277200
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com

**COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
Senior Care Centers, LLC, <i>et al.</i> ¹	§	Case No. 18-33967 (BJH)
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON AUGUST 27, 2019 AT 2:00 P.M. (CT)**

1. Motions of Debtors for (A) Entry of Orders (I) Approving Form of Operations Transfer Agreements, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief; and (B) Entry of Orders (I) Approving Settlement Agreements, and (II) Granting Related Relief [Docket Nos. 1722-1725; Filed 08/09/2019]

Objection Deadline: August 23, 2019

Related Document(s):

- a) Debtors' Motion for Expedited Consideration [Docket No. 1734; Filed 08/13/2019]
- b) Notice of Hearing [Docket No. 1747; 08/15/2019]

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- c) Debtors' List of Witnesses and Exhibits for August 27, 2019 Hearing (as amended) [Docket No. 1792; Filed 08/23/2019]

Response(s) Received:

- a) Williamson County's Response to the Debtors Motions for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 1739; Filed 08/15/2019]
- b) Comal County's Response to the Debtors Motions for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 1740; Filed 08/15/2019]
- c) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 1761; Filed 08/19/2019]
- d) Limited Objection of Onsite Dentists of Texas and Texas Nursing Home Management Solutions, LLC to Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 1762; Filed 08/19/2019]
- e) CIBC Bank USA's Response to Debtors' Motions Seeking Approval of (I) Operations Transfer Agreements and (II) Settlements with Saddleback Sundance, LLC and Saddleback Park Valley, LLC and Reservation of Rights Related Relief [Docket No. 1787; Filed 08/23/2019]

Status: This matter will go forward.

- 2. Legal Argument Pertaining to Bankruptcy Code Section 365(d)(4) and Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay Any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1479; Filed 07/02/2019]

Objection Deadline: July 23, 2019

Related Document(s):

- a) Omnibus Notice of Hearing [Docket No. 1481; Filed 07/02/2019]
- b) Debtors' Memorandum of Law in Support of Debtors' Compliance with Bankruptcy Code Section 365(d)(4) [Docket No. 1802; Filed 08/26/2019]

Response(s) Received:

- c) Objection of HC Hill Country Associates, Ltd., H-C Associates, Ltd., and HC-RW Associates, Ltd. to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1606; Filed 07/23/2019]
- d) J-S Fredericksburg Realty, LP's Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1607; Filed 07/23/2019]
- e) Hidalgo Healthcare Realty, LLC's Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1608; Filed 07/23/2019]
- f) Annaly/CHI Javelin Landlords' Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1609; Filed 07/23/2019]
- g) TXMS Real Estate Investments, Inc.'s Objection to the Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1610; Filed 07/23/2019]
- h) Orix Real Estate Capital, LLC's Response to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1627; Filed 07/25/2019]

- i) Granite Landlords Reservation of Rights and Objection to the Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1636; Filed 07/26/2019]

Status: This matter will go forward.

- 3. OLP Wyoming Springs, LLC's Amended Motion for Allowance and Payment of Administrative Expense [Docket No. 1349; Filed 06/14/2019]; OLP Wyoming Springs, LLC's Motion for Relief from Automatic Stay [Docket No. 1505; Filed 07/08/2019]; and OLP Wyoming Springs, LLC's Motion to Compel Transfer of Facility [Docket No. 1506; Filed 07/08/2019].

Related Document(s):

- a) Amended Notice of Hearing [Docket No. 1534; Filed 07/15/2019]
- b) Agreed Scheduling Order between Debtors and OLP Wyoming Springs, LLC for Discovery and Pleadings re: Hearing on (I) OLP Wyoming Springs, LLC's Amended Motion for Allowance and Payment of Administrative Expense; (II) OLP Wyoming Springs, LLC's Motion for Relief from Automatic Stay; and (III) OLP Wyoming Springs, LLC's Motion to Compel Transfer of Facility [Docket No. 1617; Filed 07/25/2019]
- c) Witness and Exhibit List of Harden Healthcare, LLC for August 27, 2019 Hearing [Docket No. 1790; Filed 08/23/2019]
- d) Witness and Exhibit List for Hearings Scheduled on August 27, 2019 [Docket No. 1791; Filed 08/23/2019]
- e) Debtors' List of Witnesses and Exhibits for August 27, 2019 Hearing on OLP Wyoming Springs, LLC Motions [Docket No. 1792; Filed 08/23/2019]

Response(s) Received:

- f) CIBC Bank USA's Response to OLP Wyoming Springs, LLC's Amended Motion for Allowance and Payment of Administrative Expense and Reservation of Rights [Docket No. 1491; Filed 07/03/2019]
- g) Debtors' Response to OLP Wyoming Springs, LLC's Amended Motion for Allowance and Payment of Administrative Expense [Docket No. 1755; Filed 08/16/2019]

- h) Debtors' Objection to OLP Wyoming Springs, LLC's Motion for Relief from the Automatic Stay [Docket No. 1756; Filed 08/16/2019]
- i) Debtors' Objection to OLP Wyoming Springs, LLC's Motion to Compel Transfer of Facility [Docket No. 1754; Filed 08/16/2019]

Status: This matter will go forward.

Dated: August 27, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ *Trey A. Monsour*
Trey A. Monsour
State Bar No. 14277200
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

-and-

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
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